

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

DEFENDANTS' OBJECTIONS TO PLAINTIFFS' TRIAL EXHIBITS

Defendants Cox Communications, Inc. and CoxCom, LLC (collectively, "Cox") hereby submits, pursuant to the Court's Order Modifying the Pretrial Schedule (ECF No. 223), its objections to the trial exhibits of Plaintiffs.

GENERAL OBJECTIONS

1. Certain of Plaintiffs' Exhibits are and/or will be the subject of Cox's motion for summary judgment, motions *in limine*, *Daubert* motions, and/or any other pre-trial or trial motions, which may be dispositive of the objections below. Cox reserves the right to file such motions.
2. Cox objects to all documents and things identified as Exhibits by Plaintiffs and intended to be used as Exhibits that include documents or information not previously produced to Cox.
3. Cox objects to all documents and things identified as Exhibits by Plaintiffs and intended to be used as Exhibits that are inconsistent with the terms of the scheduling order, the rules of the Court, the protective order in this case, or any agreement of the parties.

4. Cox reserves the right to supplement or modify its objections to any Exhibits based on pretrial rulings, rulings during the course of trial, or depending upon how Plaintiffs use the Exhibit at trial.

5. Cox reserves the right to object to any exhibit not identified on this Exhibit List or not provided to Cox prior to the filing of these objections.

6. Cox reserves the right to seek a limiting instruction for the use of any of Plaintiffs' Exhibits at trial.

Cox's Specific Objections to Plaintiffs' Exhibits are attached hereto as **Exhibit A**.

The following chart sets forth Cox's abbreviations for its Specific Objections:

Abbreviation	Objection
A	Authentication
AC	Attorney-client privilege / work product
C	Composite / not a single document
CD	Corrupt document; document altered by counsel; integrity of document lost
CM	Cumulative; duplicative of other exhibit(s) on exhibit list
DNP	Not produced during discovery
DH	Double hearsay
E	Improper expert opinion
F	Foundation
H	Hearsay
ID	Exhibit list contains insufficient identification for the use of this exhibit at trial
IE	Improper exhibit
INC	Incomplete document
IO	Incompetent, incomplete, irrelevant, or improper legal opinion
IQ	Illegible / poor quality
O	Improper opinion
OR	Objection reserved
P	Prejudicial
PSO	See prior stated objections in the exhibit
R	Relevance
U	Untimely produced

Dated: August 29, 2019

Respectfully submitted,

/s/ Thomas M. Buchanan /

Thomas M. Buchanan (VSB No. 21530)

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CERTIFICATE OF SERVICE

I certify that on August 29, 2019, a copy of the foregoing DEFENDANTS' OBJECTIONS TO PLAINTIFFS' EXHIBIT LIST was filed electronically with the Clerk of Court using the ECF system, which will send notifications to ECF participants.

/s/ Thomas M. Buchanan

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